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COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

AT RICHMOND, MARCH 28, 2000

COMMONWEALTH OF VIRGINIA, ex rel.

STATE CORPORATION COMMISSION

CASE NO. PUC000045

Ex Parte: In re: Investigation  
to implement 711 abbreviated dialing  
access to the Telecommunications  
Relay Service in Virginia

ORDER INITIATING INVESTIGATION  
AND REQUESTING COMMENTS

The Commission initiates this investigation to implement 711 abbreviated dialing access to the Telecommunications Relay Service ("TRS") operated by AT&T Communications of Virginia, Inc. ("AT&T"). We will establish a comment period on this proposed 711 implementation and will designate a "711 Implementation Committee."

On February 19, 1997, the Federal Communications Commission ("FCC") issued its First Report and Order and Further Notice of Proposed Rulemaking In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, in CC Docket No. 92-105; FCC 97-51. The First Report and Order, inter alia, ordered Bell Communications Research ("Bellcore"), as then current North American Numbering Plan Administrator ("NANPA"), to assign 711 as a national code for TRS use. Also in that Order, the FCC

tentatively concluded that nationwide implementation of 711 dialing for TRS access should occur within three years.

The use of 711 abbreviated dialing provides easier access to the TRS system. Ease of access to the TRS system furthers the goals of the Americans with Disabilities Act of 1990 which requires functionally equivalent access to the telephone network for persons with hearing or speech disabilities. Simplicity of TRS access encourages and supports use by hearing persons as well as persons with hearing and speech disabilities. Using 711 nationwide would facilitate consistency from state to state. Currently there are many TRS numbers assigned within states, often making access to the relay service confusing and difficult.

TRS now utilizes a variety of services to facilitate telephone communication by persons with hearing or speech disabilities. Relay services between text telephone ("TTY") users and voice users utilize a relay operator, called a Communications Assistant ("CA"), to read what the TTY user types to a voice telephone user and to type responses back to the TTY user throughout the duration of a telephone call.<sup>1</sup>

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<sup>1</sup> On March 6, 2000, the FCC released a Report and Order in CC Docket 98-67 which adopted additional Rules requiring speech-to-speech relay service, utilizing individuals trained in understanding certain speech patterns to relay conversations for people with speech disabilities; required that Spanish language relay service be provided for interstate calls; and encouraged the provision of video relay interpreting service by making it eligible for reimbursement from the TRS fund. Video relay interpreting

On February 18, 2000, the Commission's Division of Communications conducted a teleconference with representatives of AT&T, four Local Exchange Companies ("LECs"), the Virginia Telephone Industry Association ("VTIA"), and the Virginia Department for the Deaf and Hard of Hearing ("VDDHH"). AT&T representatives indicated their expectation that 711 abbreviated dialing access to their TRS center, located in Norton, Virginia, could be operational for the public by June 26, 2000.

#### Description of 711 Service for Virginia

The proposed plan for implementing 711 access in Virginia involves using 711 for both voice and TTY calls. Both voice and TTY users will dial 711 to access AT&T's TRS center. Incumbent Local Exchange Companies ("ILECs") and facilities-based Competitive Local Exchange Companies ("CLECs") will translate the 711 call to a new TRS 800 number. The translation normally occurs within one second. The current voice number and the current TTY number still will be available for calls for those TRS users not using the abbreviated 711 dialing.

When the call reaches the TRS, the Virginia user will enter an Enhanced Voice Upfront Automation Call Flow ("EVUFA") where voice customers will be greeted with an initial "Virginia Relay"

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utilizes Communications Assistants skilled in sign language to relay conversations for users of American Sign Language. See In the matter of Telecommunications Relay Services, 2000 WL 245346 (F.C.C., Mar. 06, 2000) (No. FCC 00-56).

prompt. Next, the customer will be prompted to press "1" for a voice call. If the user presses "1" for voice, they will go to another menu and be asked to press "0" for a CA, "1" to enter the number being called, or "2" for an explanation of how the TRS works. This initial voice prompt menu takes five to seven seconds.

If the system receives no response from the caller, the system will check for TTY signals, i.e., ASCII first, secondly Turbo Code, and third for Baudot signals. The EVUFA determines the transmission type and connects the call to a CA. For voice callers taking no action, the Relay system would time-out and transfer the caller to a CA for handling.

If the user does not press any number on the initial menu, a five-second time-out occurs, after which the caller's ANI (Automatic Number Identification) is checked for an entry in the Relay Choice Profile Database. The Relay Choice Profile Database will check the customer's telephone number and in one or two seconds will determine if there is a prearranged option in the database on the choice of call type, i.e., voice, ASCII,

Turbo Code, Baudot, Voice Carryover ("VCO"),<sup>2</sup> or Hearing Carryover ("HCO").<sup>3</sup>

If the customer has a Relay Choice Profile, the call will be sent to a CA using the appropriate call type mode, i.e., either voice, ASCII, Turbo Code, Baudot, VCO, or HCO. If the user does not have a Relay Choice Profile, the system will check for ASCII; then in about five seconds the call goes to Turbo Code seek tone. If the user does not respond to Turbo Code, the call goes to the Baudot seek tone. If the user does not respond to Baudot (again in about five seconds), the call is sent to a CA for help.

At worst, a TRS call using 711 would take no more than twenty-two seconds to be processed. This worst-case scenario assumes that the caller is using the Baudot text format and that the customer has no Relay Choice Profile set up, which thus necessitates going through all of the steps. At best, voice customers could connect to a CA in three seconds, and TTY users could connect in seven seconds.

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<sup>2</sup> VCO - Voice Carryover call type is for a deaf or hard-of-hearing person (TTY user) who wants to speak instead of type. The deaf or hard-of-hearing person talks directly into the phone. The CA types the hearing person's response to the TTY user.

<sup>3</sup> HCO - Hearing Carryover call type is for a speech-disabled person who prefers to listen rather than read. The speech-disabled person types his or her part of the conversation for the CA to read to the standard telephone user.

Both ILECs and facilities-based CLECs will need to implement 711 access in order for there to be complete statewide coverage. There will be press releases detailing the proposed implementation of 711 in the Commonwealth; a bill insert or a billing statement will be developed for inclusion in all customers' bills; and the Customer Guide pages of the telephone directories will be updated to include the use of 711 abbreviated dialing access. Payphone service providers ("PSPs") (including all LECs) will be notified of 711 implementation so that their "smart" payphones can be programmed to translate the 711 call directly from the payphone itself.

#### Conclusion

We conclude that the 711 abbreviated dialing will facilitate the hearing and speech disabled community's access to the TRS system. It is also our belief that the hearing public would be more inclined to call TRS users (those with hearing and speech disabilities) if dialing were simplified.

#### 711 Implementation

To assist the Commission with 711 implementation, we find that a 711 Implementation Committee should be established to develop guidelines for implementation in Virginia. This Committee will be charged with the following: (1) identifying processes required for implementing the 711 abbreviated dialing access; (2) identifying factors such as switch conversion

timeframes and the relay provider conversion timeframe;

(3) establishing a feasible cutover date; (4) identifying parties to be involved and/or notified of the 711 implementation plan including ILECs, CLECs, long distance companies, wireless companies, PSPs, the VTIA, and TRS user groups; (5) identifying the best method of industry notification (e.g., industry publications); (6) developing a customer notification program (press releases, directory changes, bill inserts, etc.) including template text; (7) submitting input to the Local Exchange Routing Guide; (8) determining the need for system testing and/or a trial period; (9) evaluating the need for special trouble shooting reporting procedures; and

(10) evaluating other areas the Committee deems relevant and appropriate. The 711 Implementation Committee should consist of representatives of AT&T, ILECs, CLECs, VTIA, VDDHH, PSPs, the hearing and speech disabled communities, and members of the Commission Staff. Mr. Alan Wickham, Deputy Director of the Commission's Division of Communications, should be notified by all parties desiring to serve on the 711 Implementation Committee.

#### Comments Invited

To assist the Commission in its investigation, comments are requested from any interested carrier, user, affected industry group, or advocacy group on the Commission's proposed

implementation of 711 access to TRS. All comments should be filed no later than May 1, 2000. Comments may be mailed to Joel H. Peck, Clerk, Virginia State Corporation Commission, P.O. Box 2118, Richmond, Virginia 23218, and should refer to Case No. PUC000045. Accordingly,

IT IS THEREFORE ORDERED THAT:

(1) This investigation is docketed and assigned Case No. PUC000045.

(2) All companies, users of telecommunications services, industry, advocacy groups, and other interested parties are invited to file comments by May 1, 2000, as provided above. Any corporation shall be represented by counsel in accordance with Rule 4:8 of the Commission's Rules of Practice and Procedure and shall file an original and fifteen (15) copies of any comments or request for hearing on or before the deadline. Individuals may file single copies.

(3) The Clerk is hereby directed to serve a copy of this Order to all certificated companies, including wireless companies, PSPs, the VTIA, the Atlantic Payphone Association, VDDHH, and the Virginia Association of the Deaf and the Self Help for Hard of Hearing. Thereafter, if any party desires to be added to the service list, a Notice of Participation must be filed in this case.



(4) On or before April 16, 2000, the Commission's Division of Communications shall publish once a week for two (2) consecutive weeks the following notice as classified advertising only with display border in newspapers of general circulation in the Commonwealth of Virginia:

VIRGINIA STATE CORPORATION COMMISSION  
NOTICE OF OPPORTUNITY TO COMMENT ON  
THE PROPOSED IMPLEMENTATION OF 711  
ABBREVIATED DIALING ACCESS TO THE  
TELECOMMUNICATIONS RELAY SERVICE  
CASE NO. PUC000045

The Virginia State Corporation Commission ("SCC") is inviting comments from telephone customers affected by calling into the Telecommunications Relay Service ("TRS").

The service relays conversations between people with hearing and/or speech disabilities who use text telephones (TTYs/computers) or telebraille and people who use standard telephones.

The Commission is proposing the implementation of 711 abbreviated dialing access to TRS operated by AT&T Communications of Virginia, Inc. ("AT&T"). The SCC has established a comment period on this proposed 711 implementation plan.

The use of 711 abbreviated dialing provides easier access to the TRS system. Ease of access to the TRS system furthers the goals of the Americans with Disabilities Act of 1990 that requires functionally equivalent access to the telephone network for persons with hearing and speech disabilities. Simplicity of TRS access encourages and supports use by hearing persons as well as persons with hearing and speech disabilities.

The proposed plan for implementing 711 access in Virginia involves using 711 for both voice and TTY calls. Both voice and TTY users will dial 711 to access the Relay Center. The current voice number and the current TTY number still will be available for TRS users not using abbreviated 711 dialing. AT&T indicated that their technology could be operational for the public by June 26, 2000.

Customers wishing to comment on the proposed 711 implementation or to request a hearing on the Order may do so by filing such requests or comments in writing, referring to Case No. PUC000045, with the Clerk of the Commission, Joel H. Peck, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218, on or before May 1, 2000. Any corporation shall be represented by counsel in accordance with Rule 4:8 of the Commission's Rules of Practice and Procedure and shall file an original and fifteen (15) copies of any comments or request for hearing on or before the deadline. Individuals may file single copies.